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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:  
  
ALL ACTIONS

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED] ORDER  
REGARDING HEARING ON PLAINTIFFS'  
MOTION TO ENFORCE PTO NO. 2 AND  
TO COMPEL DEFENDANTS TO PRODUCE  
LITIGATION HOLD AND PRESERVATION  
INFORMATION**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

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15 *Co-Lead Counsel for Plaintiffs*  
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**STIPULATION**

**WHEREAS**, on December 14, 2023, Plaintiffs filed their Motion to Enforce PTO No. 2 and to compel Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively “Uber”) to produce litigation hold and preservation information (the “Motion”);

**WHEREAS**, the parties have met and conferred about the issues in dispute in Plaintiffs’ Motion and an expedited briefing schedule for said Motion;

**WHEREAS**, the parties agreed to resolve Plaintiffs’ Motion on an expedited briefing schedule with Defendants’ Response to Plaintiffs’ Motion due on December 22, 2023 and Plaintiffs waiving the filing of a Reply to Defendants’ Response;

**WHEREAS**, on December 18, 2023, Judge Cisneros ordered that Defendants’ Response to Plaintiffs’ Motion would be due on December 22, 2023 and reset the hearing to January 4, 2024 at 1:30 p.m.;

**WHEREAS**, Uber’s counsel handling the argument of this Motion is unable to attend the January 4, 2024 hearing due to an unexpected serious illness;

**WHEREAS**, Plaintiffs’ counsel handling the argument of this Motion is traveling internationally the morning of January 10, 2024 and therefore agreed as a matter of professional courtesy to a continuance of the hearing until Monday, January 8 or Tuesday, January 9, 2024 before 1:30 p.m. PT; and

**THEREFORE**, the parties respectfully request the Court enter the parties’ stipulation that:

1. The January 4, 2024 hearing on Plaintiffs’ Motion to Enforce PTO No. 2 and to Compel Defendants to Produce Litigation Hold and Preservation Information is adjourned and will be continued to Monday, January 8 or Tuesday, January 9, 2024 before 1:30 p.m. PT.

**IT IS SO STIPULATED.**

1 Dated: January 3, 2024

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

2 By: /s/ Robert Atkins

3 ROBERT ATKINS  
4 RANDALL S. LUSKEY  
5 KYLE N. SMITH  
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7 ANDREA M. KELLER

8 *Attorneys for Defendants*  
9 UBER TECHNOLOGIES, INC.,  
10 RASIER, LLC, and RASIER-CA, LLC

11 Dated: January 3, 2024

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**FILER'S ATTESTATION**

I, Robert Atkins, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: January 3, 2024

By: /s/ Robert Atkins  
Robert Atkins

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7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9 **SAN FRANCISCO DIVISION**  
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11 IN RE: UBER TECHNOLOGIES, INC.,  
12 PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

13 This Document Relates to:  
14 ALL ACTIONS  
15

**[PROPOSED] ORDER GRANTING  
STIPULATION REGARDING HEARING  
ON PLAINTIFFS' MOTION TO ENFORCE  
PTO NO. 2 AND TO COMPEL DEFENDANTS  
TO PRODUCE LITIGATION HOLD AND  
PRESERVATION INFORMATION**

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17 The Court hereby GRANTS the parties' stipulation as follows:

- 18 1. The January 4, 2024 hearing on Plaintiffs' Motion to Enforce PTO No. 2 and to  
19 Compel Defendants to Produce Litigation Hold and Preservation Information is  
20 adjourned and will be continued to Monday, January 8 or Tuesday, January 9, 2024  
21 before 1:30 p.m. PT.  
22

23 **IT IS SO ORDERED.**  
24

25 Date: \_\_\_\_\_, 2024

\_\_\_\_\_  
26 HON. LISA J. CISNEROS  
27 UNITED STATES MAGISTRATE JUDGE  
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